

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of:

Petition of Somos, Inc. for a Declaratory  
Ruling Regarding Registration of  
Text-Enabled Toll Free Numbers

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WC Docket 95-155

WT Docket No. 08-7

**Comments in Support**

Comet Media hereby submits these comments in response to the Federal Communications Commission's ("Commission") November 4, 2016, Public Notice, seeking comments regarding the above-captioned matter.

*Comet Media is involved in advertising nationwide with toll free numbers. Our customers require communication with clients and potential clients either through voice or text. We currently utilize SMS for communication to customers and any disruption of this service would be detrimental to business. This not only involves our customers but the thousands of jobs our services provides through call centers.*

I. Texting to Toll-Free is Important

- Because it adds a level of service to our customers and is easier for younger generations to communicate.
- We are already utilizing our toll free numbers to text and we have invested significant time and resources.
- Branding is very important to us and its very important that the communications seem seamless and from the same company.
- Reliability is paramount and a secure network is required.

II. Actual Issues

- Under the present system, the process for text-enabling Toll-Free numbers is not secure.

- Messaging providers have the technical ability to text-enable Toll-Free numbers without the proper authorization of the entity – the end-user or, in some cases, the Resp Org – to which the Toll-Free number is assigned.
- Messaging providers also have the ability to text-enable Toll-Free numbers that are unassigned, creating a conflict with the process for assignment through the SMS/800 database. This disrupts our customers.
- The voice service and all other services over the Toll-Free Number must not be bifurcated.
- Many times, a Toll-Free Number is bundled up with other services and the control of the Toll-Free Number remains with the Resp Org.
- Toll-Free Numbers are used for dynamic ad insertion and will be reused over and over again in different ad campaigns. Text-enabling one of these numbers by a temporary end-user of the number means that end-user would be receiving texts long after the voice is assigned to different ad campaign.
- We are the Resp Org and the end-user for most/ all of our numbers, and no one else should text-enable these numbers.

### III. The Solution

- Toll-Free numbers are unique because a non-carrier – the Resp Org – is the entity responsible for controlling the assignment and routing of the Toll-Free number.
- Only the Resp Org has definitive information concerning which entity has authority to permit text-enablement of a particular Toll-Free number.
- The Resp Org is the agent for the end user, as designated by the FCC. This should not differ when services other than voice are provided using that same Toll-Free number.
- The most reliable way to ensure that Toll-Free numbers are text-enabled only with proper authorization is to require that the messaging provider inform and obtain the authorization of the Resp Org before text-enabling any Toll-Free number.
- As with other uses for telephone numbers, it is important that routing information for text messages directed to Toll-Free numbers be made available to service providers to ensure that they are able to provide services that their customers may demand.
- Consumers trying to contact a business via its Toll-Free Number need to have the assurance that no matter how they contact the business – by wireline, wireless or text, that the message ends up with the correct party.
- Businesses using Toll-Free Numbers need to have the assurance that they are the only business permitted to use that Toll-Free Number and some other business can't hijack the messaging services for that number.
- Somos's TSS Registry provides functionality that addresses these concerns.
  - When a messaging provider seeks to text-enable a number, it registers the number and enters the necessary routing information into the database.